

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VINCENT E. YORK, JR.,)	
)	
Plaintiff,)	
)	No. 21-cv-03978
vs.)	
)	Honorable Jeremy C. Daniel
JOSE SARABIA, et. al.,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE PLAINTIFF’S MEMORANDUM IN OPPOSITION
TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT IN EXCESS OF 15
PAGES**

Now comes the Plaintiff, VINCENT YORK, by and through his attorneys, LAW OFFICES OF JEFFREY J. NESLUND and ROBERTSON and DURIC, and requests leave of Court to file Plaintiff’s Memorandum of Law and Argument in Opposition to Defendants’ Motion for Partial Summary Judgment in Excess of 15 pages. In support of his motion, Plaintiff states as follows:

1. The Plaintiff’s response to the Defendants’ Motion for Summary Judgment is due on April 1, 2025.
2. Local Federal Rule 7.1 requires a brief in support of, or in opposition to, any motion, not to exceed fifteen pages in length, absent prior approval of the Court.
3. Plaintiff cannot present, in the manner he believes will be most helpful to the Court, a Memorandum in Support of his Motion for Summary Judgment in the fifteen (15) pages permitted by Local Rule 7.1.
4. Accordingly, Plaintiff respectfully requests leave of Court to file his Memorandum in Support of his Motion for Summary Judgment in excess of 15 pages (see 21-page Memorandum attached hereto as Exhibit A).

5. This request is not made to delay the proceedings, rather it is made in the interest of justice and so as to afford the Plaintiff effective representation.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests this Honorable Court grant him leave to file the Plaintiff's Memorandum in Opposition to Defendants' Motion for Partial Summary Judgment in Excess of 15 pages.

Respectfully submitted,

/s/ Jeffrey J. Neslund

Jeffrey J. Neslund

One of the Attorneys for Plaintiff

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